

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: WILLIAM EDWARD EHRET, JR.,	:	Chapter 13
RENEE EHRET	:	Case No. 5:19-bk-252-RNO
Debtors,	:	

NISSAN MOTOR ACCEPTANCE CORPORATION,	:	Motion for
Movant	:	Relief from Stay
	:	
v.	:	
	:	
WILLIAM EDWARD EHRET, JR.,	:	
RENEE EHRET,	:	
Respondents	:	
	:	
CHARLES J. DEHART, III	:	
Trustee	:	

ANSWER TO MOTION OF NISSAN MOTOR ACCEPTANCE CORPORATION

AND NOW COME Debtors, William Edward Ehret, Jr. and Renee Ehret, by and through their attorneys, Newman, Williams, Mishkin, Corveleyn, Wolfe & Fareri, P.C., and in Answer to the Motion of Nissan Motor Acceptance Corporation for Relief from Stay aver:

1. Admitted.
2. Denied to the extent paragraph 2 is anything other than a statement or conclusion of law or request for relief.
3. Admitted.
4. Admitted in part and denied in part. It is admitted as to the make, model, serial number and original contract terms. The remaining allegations are denied as after reasonable investigation the Respondents are without knowledge or information sufficient to form a belief as to the truth of these averments.

5. Denied to the extent paragraph 5 is anything other than a statement or conclusion of law or misplaced request for relief.
6. Denied to the extent paragraph 6 is anything other than a statement or conclusion of law or request for relief.
7. Admitted.
8. Admitted in part and denied in part. It is admitted as to the make, model, serial number and original contract terms. The remaining allegations are denied as after reasonable investigation the Respondents are without knowledge or information sufficient to form a belief as to the truth of these averments.
9. Denied to the extent paragraph 9 is anything other than a statement or conclusion of law or misplaced request for relief.

WHEREFORE, Debtors, William Edward Ehret, Jr. and Renee Ehret, respectfully pray this Honorable Court for an Order that the Motion of Nissan Motor Acceptance Corporation for Relief from Stay be denied, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS P.C.

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